

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 11-134 (MJD/AJB)
Criminal No. 13-091 (SRN/LIB)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	MOTION OF MICHAEL CROSBY TO
)	REDUCE SENTENCE PURSUANT TO
v.)	18 U.S.C. § 3582(c)
)	
MICHAEL JOSEPH CROSBY,)	
)	
Defendant.)	

At the request of Mr. Crosby, the undersigned counsel offers the following Motion for Compassionate Release. Pursuant to the newly-amended 18 U.S.C. § 3582(c)(1)(A)(i), we seek Mr. Crosby's release and an order reducing his sentences to the time he has time served. Mr. Crosby's circumstances satisfy the "extraordinary and compelling reasons" standard under § 3582(c)(1)(A)(i), as elaborated by the Sentencing Commission in U.S.S.G. § 1B1.13, based on his age, health concerns, and the time he has already served. U.S.S.G. § 1B1.13, Application Note 1. Further, his release is consistent with the guidelines outlined in Bureau of Prisons Program Statement 5050.50.

As such, Mr. Crosby is eligible for release. We ask the Court to exercise the discretion afforded to it under these circumstances, and to reduce his sentence to the time he has served, 102 months as of this writing. This motion is based on the file and record herein, on a supporting memorandum, and on any matters that come before the Court at or before any hearing on its merits.

Dated: October 22, 2019

Respectfully submitted,

s/ Andrew H. Mohring

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